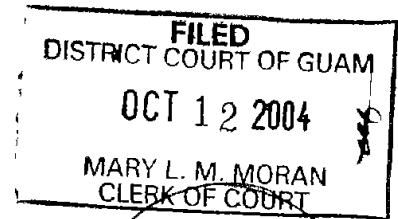


JOAQUIN C. ARRIOLA  
ANITA P. ARRIOLA  
ARRIOLA, COWAN & ARRIOLA  
259 Martyr Street, Suite 201  
Hagåtña, Guam 96910  
Tel: (671) 477-9730  
Fax: (671) 477-9734



Attorneys for Plaintiffs Alan Sadhwani, et al.

IN THE UNITED STATES  
DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU SADHWANI, )  
and K. SADHWANI'S INC., a Guam )  
corporation, )

Plaintiffs, )

vs. )

HONGKONG AND SHANGHAI )  
BANKING CORPORATION, LTD., a )  
Foreign corporation, )  
JOHN DOE I through JOHN DOE X, )

Defendants. )

CIVIL CASE NO. 03-00036

**DECLARATION OF ANITA P.  
ARRIOLA IN SUPPORT OF  
PLAINTIFFS' REPLY  
MEMORANDUM RE EX PARTE  
MOTION FOR EXTENSION OF  
TIME TO SERVE EXPERT  
WITNESS DISCLOSURES**

1. I am an attorney for plaintiffs Alan Sadhwani, et al. in the above-captioned matter.

I make this declaration in support of plaintiffs' reply memorandum re motion for extension of time to serve expert witness disclosures. I have personal knowledge of the facts contained herein.

2. On July 30, 2004 Richard Pipes, HSBC's counsel, and I appeared before Magistrate Judge Joaquin V.E. Manibusan, Jr. and recited the terms of a stipulation to an extension of the trial date and other deadlines required under Rule 16. On August 4, 2004 the parties signed a Stipulation Modifying the Scheduling Order, which was signed by the Magistrate Judge on August 18, 2004. The Stipulation Modifying the Scheduling Order superseded the previous Scheduling Order in the

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

case. Accordingly, on August 18, 2004, the trial date was rescheduled to January 25, 2005, thus changing the date for disclosure of expert witnesses, which is currently October 27, 2004.

3. HSBC has refused to produce documents and witnesses for their depositions that are necessary for plaintiffs' expert witness to give an adequate and complete expert witness report. Plaintiffs have been attempting to take the depositions of Christopher Page, Chief Credit Officer, and Magnus Montan, Associate Director, since March 1, 2004. According to deposition testimony already taken in the case, Page and Montan are the two HSBC officers from the main HSBC Hong Kong office who negotiated and/or approved the terms of the sale of the Sadhwani loan to Paradise Marine Corporation. When I attempted to negotiate a stipulation to take the depositions of Page and Montan, HSBC's counsel on March 2, 2004 stated that plaintiffs would need to obtain a Letter of Request to take the depositions of Page and Montan in Hong Kong. When plaintiffs obtained the Letter of Request, HSBC's Hong Kong lawyers asserted that the Letter of Request was defective because the Magistrate Judge had no authority to issue it. Plaintiffs then obtained a second Letter of Request. HSBC's Hong Kong counsel filed a motion to vacate or set aside the deposition orders in the Hong Kong court.

4. Concerned that plaintiffs would not be able to take the depositions of Page and Montan in Hong Kong, plaintiffs noticed the depositions of Page and Montan for October 12 and 14 in Guam. By oral Order of the Court on October 8, 2004, the Court (per Magistrate Judge Manibusan) denied HSBC's motion for a protective order and ordered the depositions to proceed as scheduled. HSBC, in a flagrant violation of the Court's Order, refused to produce Page and Montan for their depositions in Guam on the scheduled dates. A true and correct copy of the letter of Jacques Bronze dated October 9, 2004 is attached hereto as Exhibit 1.

5. The Page and Montan depositions are critical to plaintiffs' causes of action for breach of the covenant of good faith and fair dealing, breach of fiduciary duty, breach of contract - workout agreement, breach of the duty not to divulge plaintiffs' confidential banking information, and punitive damages. HSBC has fought plaintiffs at every juncture and in every court to prevent these depositions from being taken. Plaintiffs need an extension of time until November 30, 2004 so that their expert witness may have the opportunity to incorporate into the expert witness report the critical deposition testimonies of Page and Montan.

6. Plaintiffs have also noticed a Rule 30(b)(6) deposition for October 20, 2004 to take the deposition of the HSBC representative who can testify regarding the confidentiality policies and procedures at HSBC. A true and correct copy of the notice of deposition is attached hereto as Exhibit 2. By letter dated October 7, 2004, HSBC's counsel Jacques Bronze has refused to produce such a representative. A true and correct copy of the letter of October 7, 2004 is attached hereto as Exhibit 3. This deposition is critical to plaintiffs' cause of action for breach of the duty not to divulge plaintiffs' confidential banking information. Plaintiffs want their expert witness to have the benefit of this testimony in order to produce a complete report.

7. HSBC has filed numerous motions attempting to delay discovery and the trial date in this case. HSBC has also failed and refused to provide documents throughout the case, unless ordered to do so by the Court or threatened with sanctions by plaintiffs. HSBC failed to provide documents ordered by Designed District Judge Tydingco-Gatewood over two months ago and continues to refuse to produce such documents. A true and correct copy of a letter dated October 7, 2004 is attached hereto as Exhibit 4. Plaintiffs failed to receive a response from HSBC. Plaintiffs have requested documents from their first and fourth requests for production of documents, and have

still not received such documents. A true and correct copy of a letter dated October 6, 2004 to Jacques Bronze is attached hereto as Exhibit 5.

8. Any prejudice suffered by HSBC, which is speculative at best, is of its own making. Had HSBC cooperated in making Page and Montan available for their depositions or provided discovery in a timely manner, HSBC would not be faced with any "compacted" discovery or trial schedule. If HSBC decides to file a summary judgment motion on December 1, 2004, it will still have the opportunity to comment on and/or use plaintiffs' expert witness disclosures in its reply memorandum. Moreover, HSBC's claim that it would be required to take depositions of the experts between January 3 and 24, 2005 assumes that rebuttal or supplemental expert reports will be necessary, which may not be the case. Even if the depositions are required during that time, both parties are in the same position and neither party has an advantage or disadvantage. I have been involved in other cases where the depositions of witnesses, including expert witnesses, were taken just prior to and even during trial, so that HSBC's claim of "prejudice" is unavailing.

9. The prejudice suffered by plaintiffs is that without the documents and deposition testimony, any expert witness report by plaintiffs' expert would be incomplete and plaintiffs would be subject to further expense as a result of supplemental expert reports and possibly additional depositions of its expert witnesses. While it is true that some of the depositions have taken some time, none of those depositions have been ordered on an expedited basis. I have used the same court reporters (Cecilia Flores and Veronica Flores) for all of plaintiffs' depositions except one, and it is my experience with these court reporters that when a seven-hour deposition transcript is ordered on an expedited basis generally it may be completed within one week.

I declare under penalty of perjury under the laws of Guam and the laws of the United States that the foregoing is true and correct.

Dated this 12<sup>th</sup> day of October, 2004.

  
ANITA P. ARRIOLA

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

**CERTIFICATE OF SERVICE**

I, ANITA P. ARRIOLA, hereby certify that on October 12, 2004, I caused to be served via hand delivery, **DECLARATION OF ANITA P. ARRIOLA IN SUPPORT OF PLAINTIFFS' REPLY MEMORANDUM RE EX PARTE MOTION FOR EXTENSION OF TIME TO SERVE EXPERT WITNESS DISCLOSURES** to:

**Jacques G. Bronze, Esq.  
Bronze & Tang, P.C.  
2<sup>nd</sup> Floor, BankPacific Building  
825 S. Marine Drive  
Tamuning, Guam 96913**

Dated this 12<sup>th</sup> day of October, 2004.

  
ANITA P. ARRIOLA

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

LAW OFFICES  
**BRONZE & TANG**  
 A PROFESSIONAL CORPORATION  
 BANKPACIFIC BUILDING, 2ND FLOOR  
 825 SOUTH MARINE CORP DRIVE  
 TAMUNING, GUAM 96913

JACQUES G. BRONZE  
 JERRY J. TANG

TELEPHONE: (671) 646-2001  
 TELECOPIER: (671) 647-7671

October 9, 2004

**VIA: FACSIMILE**  
**(671) 477-9734**

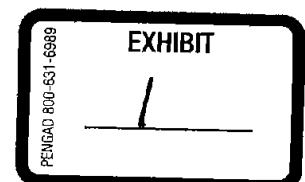
Anita P. Arriola, Esq.  
**ARRIOLA, COWAN & ARRIOLA**  
 Suite 201, C&A Professional Bldg.  
 259 Martyr Street  
 Hagåtña, Guam 96910

Re: Sadhvani, et al. v. HSBC, et al.; Civil Case No. 03-00036

Dear Anita:

I have discussed the Court's ruling relating to HSBC's Motion for a Protective Order with my client. Although my client wants to adhere with the Court's Order, Messrs. Page and Montan have already stated in a declaration under penalty of perjury that they are not available for a deposition in Guam in the month of October. Messrs. Page and Montan were not fabricating excuses not to appear at the deposition. Thus, HSBC is offering the following compromise:

1. If you insist that the depositions of Messrs. Page and Montan take place in the month of October, HSBC is amenable to making both deponents available in Hong Kong. HSBC will withdraw its Application To Vary the Deposition Order pending before the Hong Kong High Court and you will be free to conduct the depositions under the Federal Rules of Civil Procedure; or
2. Messrs. Page and Montan will appear in Guam for their depositions in the month of November before discovery cutoff, however, please advise of some proposed dates that you will be available for the proposed depositions. Once I have these dates, I will be in a position to confirm the same with my client.



10-09-2004, 11:43AM, BROCKE, J. W. ES - LAW  
Anita P. Arriola, Esq.  
**ARRIOLA, COWAN & ARRIOLA**  
October 9, 2004  
Page 2

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Obviously, the above is offered without prejudice of HSBC's right to appeal the Magistrate's Order. I want to make it clear that the above two deponents will not be appearing at the depositions scheduled for October 12 and 14, 2004. I look forward to hearing from you in this matter.

Best regards,

  
**JACQUES G. BRONZE**

cc: \*Mr. C Underwood  
\*A. Lam, Esq.

JGB:lc

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LAW OFFICES  
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TELEPHONE No.: (671) 646-2001

FACSIMILE No.: (671) 647-7671

~ ~ **FACSIMILE TRANSMITTAL SHEET** ~ ~

*Date:* October 9, 2004  
*To:* Anita P. Arriola, Esq.  
*Firm:* **ARRIOLA, COWAN & ARRIOLA**  
*Fax No:* 477-9734  
*From:* Jacques G. Bronze, Esq.  
*Subject:* **Sadhwani, et al v. HSBC, et al;** Civil Case No. 03-00036

Sending 3 page(s) including cover sheet.

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☐ Original will follow by:

Regular Mail: \_\_\_\_\_ Other: \_\_\_\_\_

**MESSAGE:**

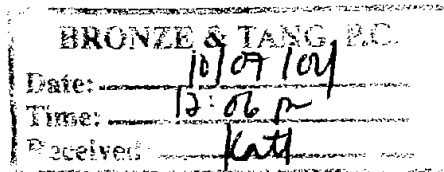
PLEASE SEE ATTACHED DOCUMENT(S) IN CONNECTION WITH THE ABOVE-REFERENCED MATTER:

Letter of even date.

**Fax Sent By: tony camacho**

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE AND THE DOCUMENTS WHICH ACCOMPANY IT ARE CONFIDENTIAL COMMUNICATIONS SUBJECT TO THE ATTORNEY-CLIENT WORK PRODUCT PRIVILEGES. They are intended exclusively for the use of the addressee named above. If you are not the intended recipient, or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copy of this communication or the accompanying document is strictly prohibited. If you have received this communication in error, please immediately notify the Law Offices of Bronze & Tang, P.C. by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

JOAQUIN C. ARRIOLA  
ANITA P. ARRIOLA  
JACQUELINE T. TERLAJE  
ARRIOLA, COWAN & ARRIOLA  
259 Martyr Street, Suite 201  
Hagåtña, Guam 96910  
Telephone: (671) 477-9730/33  
Facsimile: (671) 477-9734



Counsel for Plaintiffs Alan Sadhwani, et al.

IN THE UNITED STATES  
DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU  
SADHWANI, and K. SADHWANI'S  
INC., a Guam corporation,  
Plaintiffs,

vs.

HONGKONG AND SHANGHAI  
BANKING CORPORATION, LTD., a  
Foreign corporation, JOHN DOE I  
through JOHN DOE X,  
Defendants.

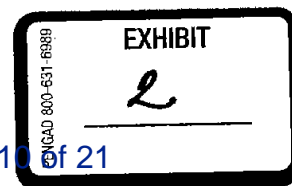
CIVIL CASE NO. 03-00036

NOTICE TO TAKE DEPOSITION

TO: DEFENDANT HONGKONG SHANGHAI BANKING CORPORATION AND ITS  
COUNSEL OF RECORD JACQUES G. BRONZE:

PLEASE TAKE NOTICE that plaintiffs will take the deposition upon oral examination of the corporate defendant, **Hongkong and Shanghai Banking Corporation, Ltd. ("HSBC")**, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure on **Wednesday, October 20, 2004 at 9:00 a.m.** HSBC shall designate one or more officers, agents or other persons who can testify on behalf of HSBC with respect to the following matters: See Exhibit A, attached hereto.

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910



The deposition will be taken at the law offices of ARRIOLA, COWAN & ARRIOLA, 259  
Martyr Street, Suite 201, Hagatna, Guam.

The deposition shall be taken before a notary public or other authorized by law to administer  
oaths. The deposition will be recorded by stenographic means.

DATED: October 7, 2004.

ARRIOLA, COWAN & ARRIOLA

By: Anita P. Arriola  
ANITA P. ARRIOLA  
Attorneys For Plaintiffs

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

## EXHIBIT A

HSBC shall designate one or more officers, agents, or other persons who can testify on behalf of HSBC with respect to the following matters:

1. HSBC's policies or procedures for keeping confidential the records, financial information, and banking transactions of HSBC customers, that were in effect at HSBC from January 1, 2002 through the date of this request.
2. HSBC's policies or procedures for disclosure of the records, financial information and banking transactions of HSBC's customers, that were in effect at HSBC from January 1, 2002 through the date of this request.
3. HSBC's policies or procedures for protecting the confidentiality and privacy rights of HSBC's customers, that were in effect at HSBC from January 1, 2002 through the date of this request.
4. HSBC's employee or other manuals relating to keeping confidential the records, financial information, and banking transactions of HSBC customers, that were in effect at HSBC from January 1, 2002 through the date of this request.
5. HSBC's employee or other manuals relating to disclosure of the records, financial information and banking transactions of HSBC's customers, that were in effect at HSBC from January 1, 2002 through the date of this request.
6. HSBC's employee or other manuals for protecting the confidentiality and privacy rights of HSBC's customers, that were in effect at HSBC from January 1, 2002 through the date of this request.

7. The training of HSBC employees in keeping confidential the records, financial information and banking transactions of HSBC's customers, from January 1, 2002 through the date of this request.

8. The training of HSBC employees in disclosure of the records, financial information and banking transactions of HSBC's customers, from January 1, 2002 through the date of this request.

9. The training of HSBC employees in protecting the confidentiality and privacy rights of HSBC's customers, from January 1, 2002 through the date of this request.

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

**CERTIFICATE OF SERVICE**

I, ANITA P. ARRIOLA, hereby certify that on October 7, 2004, I caused to be served via hand delivery, a **NOTICE TO TAKE DEPOSITION** to:

**Jacques G. Bronze, Esq.  
Bronze & Tang, P.C.  
2nd Floor, BankPacific Building  
825 S. Marine Drive  
Tamuning, Guam 96913**

Dated this 7th day of October, 2004.

  
ANITA P. ARRIOLA

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

LAW OFFICES  
**BRONZE & TANG**  
A PROFESSIONAL CORPORATION  
BANKPACIFIC BUILDING, 2ND FLOOR  
825 SOUTH MARINE CORP DRIVE  
TAMUNING, GUAM 96913

JACQUES G. BRONZE  
JERRY J. TANG

TELEPHONE: (671) 646-2001  
TELECOPIER: (671) 647-7671

October 7, 2004

**VIA: FACSIMILE**  
**(671) 477-9734**

Anita P. Arriola, Esq.  
**ARRIOLA, COWAN & ARRIOLA**  
Suite 201, C&A Professional Bldg.  
259 Martyr Street  
Hagåtña, Guam 96910

Re: **Sadhvani, et al. v. HSBC, et al.**; Civil Case No. 03-00036

Dear Anita:

I am in receipt of your notice of deposition served on my office this morning relating to a 30(b)(6) deposition scheduled for October 20, 2004. In review of the notice of deposition, it indicates that you are seeking HSBC to designate certain officers to testify relating to policies and procedures relating to confidentiality and disclosure of financial information. The HSBC Guam branch no longer has a compliance officer employed relating to the aforementioned matters. Nor does the Hong Kong branch have anything to do with compliance matters as it relates to the Guam branch. On a consulting basis, John Hudson employed by HSBC USA was providing supervisory compliance advice relating to the Guam branch. However, Mr. Hudson is not employed by HSBC, but rather by HSBC USA. HSBC has no power to compel Mr. Hudson to Guam and Judge Gatewood has already ruled on this issue. Thus, to the extent that you believe you need additional information relating to the matters contained in your notice of deposition, please notice Mr. Hudson's deposition in New York.

Please feel free to contact me if you have any questions regarding the above matter.

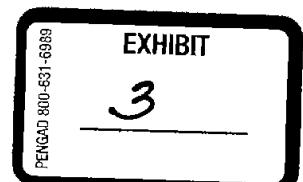
Best regards,

  
**JACQUES G. BRONZE**

cc: \*Mr. C. Underwood

JGB:kbm

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LAW OFFICES  
**BRONZE & TANG**  
 A PROFESSIONAL CORPORATION  
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 825 SOUTH MARINE CORP DRIVE  
 TAMUNING, GUAM 96913

TELEPHONE No.: (671) 646-2001

FACSIMILE No.: (671) 647-7671

~ ~ **FACSIMILE TRANSMITTAL SHEET** ~ ~

*Date:* October 7, 2004

*To:* Anita P. Arriola, Esq.

*Firm:* **ARRIOLA, COWAN & ARRIOLA**

*Fax No:* 477-9734

*From:* Jacques G. Bronze, Esq.

*Subject:* **Sadhvani, et al. v. HSBC, et al.**; Civil Case No. 03-00036

Sending 2 page(s) including cover sheet.

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☐ Original will follow by:

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**MESSAGE:**

PLEASE SEE ATTACHED DOCUMENT(S) IN CONNECTION WITH THE ABOVE-REFERENCED MATTER:

Letter of even date.

**Fax Sent By: kasteen mafnas**

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Law Offices

**Arriola, Cowan & Arriola**

Joaquin C. Arriola  
Mark E. Cowan  
Anita P. Arriola  
Joaquin C. Arriola, Jr.

259 Martyr Street, Suite 201  
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Telephone: (671) 477-9730/3  
Telecopier: (671) 477-9734  
E-mail: [acalaw@netpci.com](mailto:acalaw@netpci.com)

~  
Jacqueline T. Terlaje

October 7, 2004

**VIA FACSIMILE: (671) 647-7671**

Jacques G. Bronze, Esq.  
Bronze & Tang, P.C.  
2nd Floor, BankPacific Building  
825 S. Marine Drive  
Tamuning, Guam 96913

**Re: Sadhwani et al. v. Hongkong Shanghai Banking Corporation, Ltd., et.al.  
District Court of Guam, Civil Case No. CV03-00036**

Dear Jacques:

I am in receipt of an Order dated October 6, 2004 denying HSBC's Motion to Reconsider Order dated August 10, 2004. The Order of August 10, 2004 required HSBC to produce certain bank documents and information pertaining to Joseph K. Fang and certain of his family members. The Order has been outstanding for two months and we have yet to receive any documents required by the court Order.

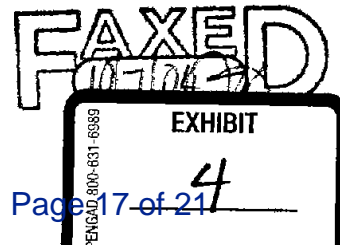
Please provide the documents as required by the Order of August 10, 2004 on or before October 12, 2004 or we will be forced to file a motion to compel compliance with the court Order and for sanctions.

Please do not hesitate to contact me if you have any questions or concerns regarding this matter.

Very truly yours,

  
ANITA P. ARRIOLA

APA/ctt



MESSAGE CONFIRMATION

OCT-07-2004 10:35 AM THU

FAX NUMBER : 6714779734  
NAME : ARRIOLACOWAN&ARRIOLA

NAME/NUMBER : 6477671  
PAGE : 2  
START TIME : OCT-07-2004 10:34AM THU  
ELAPSED TIME : 01'20"  
MODE : STD ECM  
RESULTS : [ O.K ]

Law Offices

**Arriola, Cowan & Arriola**

Joaquin C. Arriola  
Mark E. Cowan  
Anita P. Arriola  
Joaquin C. Arriola, Jr.  
Jacqueline T. Terlaje

259 Martyr Street, Suite 201  
C & A Building  
Post Office Box X  
Hagåtña, Guam 96910

Telephone: (671) 477-9730/3  
Telecopier: (671) 477-9734  
E-mail: acalaw@netpcl.com

**TELECOPIER COVERSHEET**

DATE: October 7, 2004

TO: Jacques G. Bronze, Esq. FACSIMILE NO.: (671) 647-7671  
Bronze & Tang, P.C.  
FROM: Anita P. Arriola, Esq.  
RE: Sadhvani et al. v. Hongkong Shanghai Banking Corporation, Ltd., et al.  
District Court of Guam, Civil Case No. CV03-00036

TOTAL PAGES TRANSMITTING (INCLUDING COVER SHEET): 2

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**MESSAGE:**

Transmitting letter dated October 7, 2004 in connection with the above-referenced matter. Thank you.

APA/crt

If there is a problem with transmittal, please call Cynthia Tongson at (671) 477-9730/33.

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Law Offices

***Arriola, Cowan & Arriola***

Joaquin C. Arriola  
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Joaquin C. Arriola, Jr.

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E-mail: [acalaw@netpci.com](mailto:acalaw@netpci.com)

~  
Jacqueline T. Terlaje

October 6, 2004

**VIA FACSIMILE: (671) 647-7671**

Jacques G. Bronze, Esq.  
Bronze & Tang, P.C.  
2nd Floor, BankPacific Building  
825 S. Marine Drive  
Tamuning, Guam 96913

**Re: Sadhwani et al. v. Hongkong Shanghai Banking Corporation, Ltd., et.al.  
District Court of Guam, Civil Case No. CV03-00036**

Dear Jacques:

This is to follow up on certain documents requested by plaintiffs in their First Set of Requests for Production of Documents and Third Set of Requests for Production of Documents.

In reviewing the deposition transcript of Cecilia Galman, it is clear that HSBC provided certain documents to the Global Fixed Income Credit Market group concerning the potential sale of HSBC's loans. HSBC has failed to provide any such documents in response to Request Nos. 9 and 10 in its First Set of Requests for Production of Documents.

In reviewing the deposition transcript of Catherine Champaco, Ms. Champaco testified that she received email communications from the HSBC New York branch office (specifically, a person named John Hudson) concerning rules, regulations, statutes and other authorities that applied to the HSBC Guam office, including confidentiality policies. You had indicated to me in an earlier meeting that all of the emails between Ms. Champaco and the New York branch were contained in the HSBC manuals produced by the bank, but that is clearly not the case. The manuals contain one or two emails and they are not between Ms. Champaco and the John Hudson of the New York branch concerning confidentiality policies and procedures. HSBC has failed to provide any emails between Ms. Champaco and Mr. Hudson, which would be responsive to Request Nos. 5 and 6 in plaintiffs' Third Set of Requests for Production of Documents.

**FAXED**  
10/6/04

EXHIBIT

5

Jacques G. Bronze Esq.

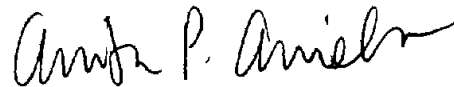
**Re: Sadhwani et al. v. Hongkong Shanghai  
Banking Corporation, Ltd., et.al.**

October 6, 2004

The First and Third Set of Requests for Production of Documents were served on HSBC months ago and the foregoing documents should have been provided months ago. Please provide these documents on or before Tuesday, October 12, 2004 or I shall be forced to file a motion to compel with respect to both sets of document requests.

Please contact me if you have any questions or concerns regarding this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Anita P. Arriola", with a stylized flourish at the end.

**ANITA P. ARRIOLA**

MESSAGE CONFIRMATION

OCT-06-2004 04:29 PM WED

FAX NUMBER : 6714779734  
NAME : ARRIOLACOWAN&ARRIOLA

NAME/NUMBER : 6477671  
PAGE : 3  
START TIME : OCT-06-2004 04:28PM WED  
ELAPSED TIME : 01'46"  
MODE : STD ECM  
RESULTS : [ O.K. ]

Law Offices

**Arriola, Cowan & Arriola**

Joaquin C. Arriola  
Mark E. Cowan  
Anita P. Arriola  
Joaquin C. Arriola, Jr.  
Jacqueline T. Terlajo

259 Martyr Street, Suite 201  
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Telephone: (671) 477-9730/3  
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DATE: October 6, 2004

TO: Jacques G. Bronze, Esq.  
Bronze & Tang, P.C.  
FACSIMILE NO.: (671) 647-7671  
FROM: Anita P. Arriola, Esq.  
RE: Sadhvani et al. v. Hongkong Shanghai Banking Corporation, Ltd., et al.  
District Court of Guam, Civil Case No. CV03-00036

TOTAL PAGES TRANSMITTING (INCLUDING COVER SHEET): 3

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